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UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

KEITH ANDREWS, an individual,
 TIFFANI ANDREWS, an individual,
 BACIU FAMILY LLC, a California
 limited liability company, ROBERT
 BOYDSTON, an individual, CAPTAIN
 JACK'S SANTA BARBARA TOURS,
 LLC, a California limited liability
 company, MORGAN CASTAGNOLA, an
 individual, THE EAGLE FLEET, LLC, a
 California limited liability company,
 ZACHARY FRAZIER, an individual,
 MIKE GANDALL, an individual,
 ALEXANDRA B. GEREMIA, as Trustee
 for the Alexandra Geremia Family Trust
 dated 8/5/1998, JIM GUELKER, an
 individual, JACQUES HABRA, an
 individual, ISURF, LLC, a California
 limited liability company, MARK

Case No. 2:15-cv-04113-PSG-JEM

[Consolidated with Case Nos. 2:15-CV- 04573 PSG (JEMx), 2:15-CV-4759 PSG (JEMx), 2:15-CV-4989 PSG (JEMx), 2:15-CV-05118 PSG (JEMx), 2:15-CV- 07051- PSG (JEMx)]

DECLARATION OF ROBERT J. NELSON IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Date: November 7, 2016
 Time: 1:30 p.m.
 Courtroom: Hon. Philip S. Gutierrez

1 KIRKHART, an individual, MARY
 2 KIRKHART, an individual, RICHARD
 3 LILYGREN, an individual, HWA HONG
 4 MUH, an individual, OCEAN ANGEL IV,
 5 LLC, a California limited liability
 6 company, PACIFIC RIM FISHERIES,
 7 INC., a California corporation, SARAH
 8 RATHBONE, an individual,
 9 COMMUNITY SEAFOOD LLC, a
 10 California limited liability company,
 11 SANTA BARBARA UNI, INC., a
 12 California corporation, SOUTHERN CAL
 13 SEAFOOD, INC., a California
 14 corporation, TRACTIDE MARINE
 15 CORP., a California corporation, WEI
 16 INTERNATIONAL TRADING INC., a
 17 California corporation and STEPHEN
 18 WILSON, an individual, individually and
 19 on behalf of others similarly situated,

20 Plaintiffs,

21 v.

22 PLAINS ALL AMERICAN PIPELINE,
 23 L.P., a Delaware limited partnership,
 24 PLAINS PIPELINE, L.P., a Texas limited
 25 partnership, and JOHN DOES 1 through
 26 10,

27 Defendants.

28 I, Robert J. Nelson, declare as follows:

1. I am a partner in the law firm of Lieff, Cabraser, Heimann &
 Bernstein, LLP (“LCHB”), and am counsel of record for Plaintiffs in this matter. I
 am a member in good standing of the Bar of the State of California and admitted to
 practice in this Court. I make this Declaration of my own personal knowledge, and
 if called to do so, could testify competently to the matters stated herein.

Plaintiff Declarations

2. Attached hereto as Exhibit 1 is a true and correct copy of the
 Declaration of Keith Andrews in Support of Plaintiffs’ Motion for Class
 Certification.

1 3. Attached hereto as Exhibit 2 is a true and correct copy of the
2 Declaration of Arnulfo Baez in Support of Plaintiffs' Motion for Class
3 Certification.

4 4. Attached hereto as Exhibit 3 is a true and correct copy of the
5 Declaration of Joshua D. Belchere in Support of Plaintiffs' Motion for Class
6 Certification .

7 5. Attached hereto as Exhibit 4 is a true and correct copy of the
8 Declaration of Robert R. Boydston in Support of Plaintiffs' Motion for Class
9 Certification.

10 6. Attached hereto as Exhibit 5 is a true and correct copy of the
11 Declaration of Morgan Castagnola in Support of Plaintiffs' Motion for Class
12 Certification.

13 7. Attached hereto as Exhibit 6 is a true and correct copy of the
14 Declaration of Zachary Frazier in Support of Plaintiffs' Motion for Class
15 Certification.

16 8. Attached hereto as Exhibit 7 is a true and correct copy of the
17 Declaration of Mike Gandall in Support of Plaintiffs' Motion for Class
18 Certification.

19 9. Attached hereto as Exhibit 8 is a true and correct copy of the
20 Declaration of Alexandra B. Geremia in Support of Plaintiffs' Motion for Class
21 Certification.

22 10. Attached hereto as Exhibit 9 is a true and correct copy of the
23 Declaration of Jim Guelker in Support of Plaintiffs' Motion for Class Certification.

24 11. Attached hereto as Exhibit 10 is a true and correct copy of the
25 Declaration of Pete Guglielmo on behalf of Pacific Rim Fisheries, Inc. and
26 Southern Cal Seafood, Inc. in Support of Plaintiffs' Motion for Class Certification.
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28

1 12. Attached hereto as Exhibit 11 is a true and correct copy of the
2 Declaration of Jacques Habra in Support of Plaintiffs' Motion for Class
3 Certification.

4 13. Attached hereto as Exhibit 12 is a true and correct copy of the
5 Declaration of Mark Hicks in Support of Plaintiffs' Motion for Class Certification.

6 14. Attached hereto as Exhibit 13 is a true and correct copy of the
7 Declaration of Mary Kirkhart in Support of Plaintiffs' Motion for Class
8 Certification.

9 15. Attached hereto as Exhibit 14 is a true and correct copy of the
10 Declaration of Richard Lilygren in Support of Plaintiffs' Motion for Class
11 Certification.

12 16. Attached hereto as Exhibit 15 is a true and correct copy of the
13 Declaration of Ronald MacLeod on behalf of Baciú Family LLC in Support of
14 Plaintiffs' Motion for Class Certification.

15 17. Attached hereto as Exhibit 16 is a true and correct copy of the
16 Declaration of Hwa Hong Muh in Support of Plaintiffs' Motion for Class
17 Certification.

18 18. Attached hereto as Exhibit 17 is a true and correct copy of the
19 Declaration of Thuy Trinh Nguyen in Support of Plaintiffs' Motion for Class
20 Certification.

21 19. Attached hereto as Exhibit 18 is a true and correct copy of the
22 Declaration of Alelia Parenteau in Support of Plaintiffs' Motion for Class
23 Certification.

24 20. Attached hereto as Exhibit 19 is a true and correct copy of the
25 Declaration of Sarah Rathbone in Support of Plaintiffs' Motion for Class
26 Certification.

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21. Attached hereto as Exhibit 20 is a true and correct copy of the Declaration of David Tibbles on behalf of Ocean Angel IV, LLC in Support of Plaintiffs' Motion for Class Certification.

22. Attached hereto as Exhibit 21 is a true and correct copy of the Declaration of Stephen Wilson in Support of Plaintiffs' Motion for Class Certification.

23. Attached hereto as Exhibit 22 is a true and correct copy of the Declaration of Weihai Zhuang in Support of Plaintiffs' Motion for Class Certification.

Other Evidence

24. Attached hereto as Exhibit 23 is a true and correct copy of a webpage titled "Plains Line 901 Information Center" as accessed at <http://www.plainsline901response.com/go/doc/7266/2547486/> (last visited August 22, 2016).

25. Attached hereto as Exhibit 24 is a true and correct copy of a Letter from Zach Barrett of the United States Department of Transportation's Office of Pipeline Safety to Bob Gorham of the Pipeline Safety Division of the California State Fire Marshall dated May 18, 2016.

26. Attached hereto as Exhibit 25 is a true and correct copy of the Executive Summary of a report issued by the Pipeline and Hazardous Materials Safety Administration of the United States Department of Transportation titled "Failure Investigative Report – Plains Pipeline, LP, Line 901 – Crude Oil Release, May 19, 2015 – Santa Barbara County, California" (appendices removed for brevity).

27. Attached hereto as Exhibit 26 is a true and correct copy of the Order and Judgment Granting Final Approval of Economic and Property Damages Settlement [sic] and Confirmation Certification of The Economic and Property

1 Damages Settlement Class filed in *In Re: Oil Spill by the Oil Rig "Deepwater*
2 *Horizon" in the Gulf of Mexico, on April 20, 2010*, MDL no. 2179 (E.D. La.).

3 28. Attached hereto as Exhibit 27 is a true and correct copy of relevant
4 portions of the transcript of the July 13, 2016 deposition of Keith Andrews.

5 I declare under penalty of perjury that the foregoing is true and correct.

6
7 Executed this 22nd day of August, 2016, at San Francisco, California.

8
9 /s/ Robert J. Nelson

CERTIFICATE OF SERVICE

I, Robert J. Nelson, hereby certify that on August 22, 2016, I electronically filed Plaintiffs' **DECLARATION OF ROBERT J. NELSON IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION** with the Clerk of the United States District Court for the Central District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Robert J. Nelson
Robert J. Nelson